

PAID

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MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ARELIOUS REED

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

CITIZENS BANK

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:25-cv-12176

Assigned To : Drain, Gershwin A.

Referral Judge: Grand, David R.

Assign. Date : 7/17/2025

Description: CMP ARELIOUS REED v CITIZENS BANK
(LLH)

Jury Trial: ☒ Yes ☐ No
(check one)

Complaint for a Civil Case

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Arelious Reed</u>
Street Address	<u>1515 Fort St. Unit 96</u>
City and County	<u>Lincoln Park, Wayne</u>
State and Zip Code	<u>Michigan, 48146</u>
Telephone Number	<u></u>
E-mail Address	<u>reedarel@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Citizens Bank</u>
Job or Title (if known)	<u></u>
Street Address	<u>23455 Eureka Road</u>
City and County	<u>Taylor, Wayne</u>
State and Zip Code	<u>Michigan, 48180</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

Defendant No. 3

Name _____
 Job or Title _____
 (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known) _____

Defendant No. 4

Name _____
 Job or Title _____
 (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title 12 CFR Section 229.10(c)(2) Subpart B, Title 15 U.S.C. Section 6604 (a)(3) (Under Y2K Action), Title 12 CFR Section 229.10(c) Subpart B and Title 42 U.S.C. Section 1983.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

- a. If the plaintiff is an individual
The plaintiff, (name) Arelious Reed,
is a citizen of the State of (name) Michigan.
- b. If the plaintiff is a corporation
The plaintiff, (name) _____,
is incorporated under the laws of the State of (name) _____,
and has its principal place of business in the
State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

- a. If the defendant is an individual
The defendant, (name) _____, is a citizen of the
State of (name) _____. Or is a citizen of (foreign
nation) _____.
- b. If the defendant is a corporation
The defendant, (name) Citizens Bank, is incorporated
under the laws of the State of (name) Michigan, and
has its principal place of business in the State of (name)
Michigan. Or is incorporated under the laws of
(foreign nation) _____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

\$114,600,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see attach Complaint.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ARELIOUS REED

PLAINTIFF,

CASE NO.

V.

HONORABLE JUDGE:

MAGISTRATE JUDGE:

CITIZENS BANK

DEFENDANT.

A. Reed

CAUSE OF ACTION: COUNT I: Title 12 CFR Section 229.10 -Next-Day Availability; COUNT II: Title 15 U.S.C. Section 6604 (a)(3)- Punitive damages limitations; COUNT III: Title 42 U.S.C. Section 1983- Civil action for deprivation of rights; COUNT IV: MCL Section 487.691- Adverse claim to bank deposit; notice; restraining order; exception; COUNT V: MCL Section 600.2952- Failure of maker to pay amount of dishonored check, draft, or order; liability; written demand for payment; delivery and text; effect of payment before trial; jurisdiction of action; COUNT VI: MCL Section 600.2945 (f)- Noneconomic loss; COUNT VII: MCL Section 600.5805 (1)(2)- Injuries to persons or property; period of limitations; "adjudication," "criminal sexual conduct," and "dating relationship" defined; COUNT VIII: Title 12 CFR Subpart B - Subpart B-Availability of funds and Disclosure of funds Availability Policies; COUNT VIII: Federal Rules Of Civil Procedure- Rule 38. Right to A Jury Trial Demand.

VERIFIED COMPLAINT

1. Plaintiff, ARELIOUS REED, is an individual and do business with the resident at 1515 Fort Street Unit 96 Lincoln Park, MI 48146 resides in the County of Wayne Michigan.
2. The Defendant CITIZENS BANK, is A Corporation residing at 23455 Eureka Road Taylor, MI 48180 and which does business in the City of Taylor, MI and throughout the State of Michigan and/or The United States of America.

This verified complaint arises out of Defendant Citizens Bank, callous indifference “Gross Negligence” pursuant to **Title 42 U.S.C Sec. 1983**, which deprivation of Plaintiff Arelious Reed, rights by generally taking away and withholding plaintiff’s U.S. Department of the Treasury checks that he is entitled to and have a right to possess, use, or enjoy basic necessities. Which cause plaintiff a noneconomic loss pursuant to **MCL Section 600.2945 (f)**, whereas defendant gross negligence inconvenience plaintiff for the loss of society and finding a companionship. The defendant misconducts and gross negligence cause plaintiff injuries to persons pursuant to **MCL Section 600.5805 (1)(2)**. However, the defendant acted with

specific intent to injure the plaintiff pursuant to **Title 15 U.S.C. Section 6604 (a)(3)** and under the **Y2K action**. On or about January 24, 2025, The U.S. Department of the Treasury, issued Plaintiff out two checks, each check exceeding the amount of \$5,525.00 pursuant to **Title 12 CFR Section 229.10(c) Subpart B**. On or about January 31, 2025, Plaintiff, Arelious Reed deposit both checks into the ATM machine at Defendant, Citizens Bank location on 23455 Eureka Road Taylor, MI 48180 pursuant to **Title 12 CFR Section 229.10(c)(2) Subpart B**. On or about February 07, 2025, Plaintiff went into one of the Defendant bank locations and stated when will my funds be available and the Defendants stated on the 10th of February 2025. On or about February 10, 2025, Plaintiff went into one of Defendants locations and requests funds the Defendants stated to plaintiff that there is a hold on the money until February 24, 2025 and sent plaintiff out the first letter of Notice of Delayed Funds Availability dated on February 03, 2025, stating that these funds will be available on February 10, 2025 pursuant to **MCL Section 600.2952**. On or about February 24, 2025, Plaintiff went back into one of Defendants bank locations demanding funds and the Defendants stated to plaintiff that the funds will not be available until April the 7th of 2025, if we want to we may extended the hold pursuant to **MCL Section 487.691**. On or about February 10, 2025, the Defendants sent Plaintiffs a

second and third letter out by U.S. mail stating that Important Notice of Extension of Hold on Deposit the reason for extension of hold some of the information on the check is not consistent with other information on the check, as a result you will be unable to withdraw, or otherwise use money from the deposit amount, until the hold is remove in 15 business days from the date of deposit. On or about June 10, 2025, defendant sent Plaintiffs a fourth and fifth letter out by U.S. mail stating that Important Notice of Extension of Hold on Deposit the reason for extension of hold some of the information on the check is not consistent with other information on the check, funds will be available on October 20, 2025. On or about February 24, 2025, Plaintiff has filed a complaint with The Consumer Financial Protection Bureau (CFPB).

Wherefore:

For the reasons set forth above, Plaintiff ARELIOUS REED, is seeking relief sought against Defendant CITIZENS BANK, under **Title 15 U.S.C. Section 6604 (a)(3), Title 42 U.S.C. Section 1983, MCL Section 600.2952, MCL Section 487.691, MCL Section 600.2945 and (f) MCL Section 600.5805 (1)(2)** in the amount of \$114,600,000.00. Furthermore, Plaintiff ARELIOUS REED demand a trial by Jury pursuant to **Federal Rules of Civil Procedure Rule 38**. However, plaintiff is willing to settle out of Court on his relief sought damages for half of the amount that he is seeking.

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Title 15 U.S.C. Section 6604 (a)(3), Title 42 U.S.C. Section 1983, MCL Section 600.2952, MCL Section 487.691, MCL Section 600.2945 and (f) MCL Section 600.5805 (1)(2).

However, plaintiff is willing to settle out of Court on his relief sought damages for half of the amount that he is seeking.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 17, 2025.

Signature of Plaintiff

A. Reed

Printed Name of Plaintiff

Arelious Reed

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

Additional Information:

JS 44 (Rev. 10/20)

CIVIL COVER SHEETCounty in which action arose: WAYNE

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
ARELIOUS REED**DEFENDANTS**
CITIZENS BANK(b) County of Residence of First Listed Plaintiff Wayne
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant Wayne
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729a) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title 12 CFR Section 229.10(c) Subpart B, Y2K action and Title 12 CFR Section 229.10(c)(2) Subpart B

Brief description of cause:

Failure of maker to pay amount of dishonored check

VII. REQUESTED IN COMPLAINT:☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

114,600,000

CHECK YES only if demanded in complaint.

JURY DEMAND

☒ Yes☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE Hon. Mark A. GoldsmithDOCKET NUMBER 25-10561

DATE

SIGNATURE OF ATTORNEY OF RECORD

07/17/25

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☒ Yes
☐ No

If yes, give the following information:

Court: UNITED STATES DISTRICT COURT

Case No.: 25-cv-10561

Judge: Hon. Mark A. Goldsmith

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
